## **REMARKS**

Claims 1-27 are presently pending in the application. The specification and drawings stand as filed.

Reconsideration of the objections and rejections set forth in the aforementioned Office Action is respectfully requested in view of the following remarks. The basis for the amendments can be found throughout the Specification, Claims and Drawings as originally filed.

## REJECTION UNDER 35 U.S.C. § 102

Claims 1-7 and 11-21 stand rejected under 35 U.S.C. § 102(b) as being anticipated by EPO 0 227 275. This rejection is respectfully traversed.

The Applicants respectfully submit that EPO '275 does not disclose each and every element in pending independent claims 1, 13 or 21. Specifically, with regard to claim 1, EPO '275 does not disclose an industrial parts washer having a chamber selectively moveable from a first position clear of the part to a second position engaging the stand where the stand and the chamber form a sealed volume encapsulating the part when the chamber is in the second position. On the contrary, EPO '275 discloses a moveable vertical support wall 3 having cradles 1 and 2 fixed thereto for supporting the parts. The housings 7 and 8 are fixed at their current position and vertical wall 3 along with cradles 1 and 2 and the parts to be washed are moveable in the direction of the arrow shown in Figures 1 and 2. Accordingly, the Applicants respectfully submit that EPO '275 does not disclose a chamber selectively moveable from a first position clear of a part supported by a stand to a second position engaging the stand where the stand

and the chamber form a sealed volume encapsulating the part when the chamber is in the second position. Therefore, the Applicants respectfully request withdrawal of the § 102 rejections.

## REJECTION UNDER 35 U.S.C. § 103

Claims 2 and 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over EPO 0 227 275. Claim 10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over EPO 0 227 275 in view of Neumann et al. (USPN 5,188,135). Claims 22-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable EPO 0 227 275 in view of Kramer et al. (USPN 5,000,206). These rejections are respectfully traversed.

The Applicants respectfully submit that each of the claims rejected under 35 U.S.C. § 103(a) depend from of independent claims 1, 13 or 21. Furthermore, each of these claims is rejected in combination based on reference EPO '275. As such, the Applicants respectfully rely on the argument previously set forth relating to the 35 U.S.C. § 102(b) rejections. Accordingly, the Applicants respectfully request withdrawal of the § 103 rejections and that the Examiner pass the case to allowance.

## CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner

believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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